



TopUp Learning – Safeguarding Policy

Safeguarding Statement: TopUp Learning is committed to safeguarding and promoting the welfare of everyone at TopUp Learning, in particular those aged under 18. We are fully committed to ensuring that consistent effective safeguarding procedures are in place on site, off-site and online to support **everyone** (including but not limited to staff, students, host families and group leaders) within the organisation. We expect all TopUp Learning staff to share this commitment and behave accordingly.

All concerns are passed to our Designated Safeguarding Lead (DSL).

Our DSPs are Ms Sacha Smallwood and Mrs Siân Matos. The Senior Manager responsible for Safeguarding-DSL is Mrs Siân Matos.

The purpose of this policy is to ensure that everyone at TopUp Learning is aware of what safeguarding is, why it is important, and the behaviour expected of them. It is linked closely with our Staff and Student Code of Conducts. We expect all adults reading this document to be clear on their role and responsibilities.

Key terminology:

“safeguarding” - this is a term to mean the overall care of everyone and looking after those aged 16 or 17 (in adult classes), 12-15 year olds (in face to face closed groups or individuals) or under 18 students online while they are under our duty of care

“child protection” - Protecting children and vulnerable adults from abuse

“abuse” - all forms of physical and/ or emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context or relationship of responsibility, trust or power

“concerns” - these are when someone worried or concerned that a child, (under 18) is at risk of harm, or that they are not being cared for in the appropriate manner

“disclosure/ allegations” - this is when there is information which shows that an adult may have behaved in a way that harms a child, had committed a criminal offence against a child or related to a child or has behaved in a way that could pose a risk of harm mid working closely with or regularly with a child.

Related Policies:

Student Code of Conduct

Staff Code of Conduct

Health and Safety Policy

Fire Safety Policy

Bullying and Harassment Policy

E-Safety Policy

Excursions Policy

Attendance Policy

Prevent Policy
Parental Agreement

Policy Review: TopUp Learning policies are all reviewed annually by the Designated Safeguard (s) and the Senior Manager responsible for Safeguarding. Students and teachers are consulted throughout the year, see section 5.

Yearly Report: At the end of each year the DS(s) will create a yearly report on the concerns and allegations. This is a record of the year and reviews the actions taken.

This document has 6 Sections:

1. Safer Recruitment
2. Welfare of Under 18 students in the school
3. Welfare of Under 18 students online
4. Risk Assessments
5. Supervision Ratio
6. TopUp Learning Methods for Raising Awareness of Safeguarding
7. Child Protection including awareness, dealing with concerns and allegations, recording and reporting.

1.Safer Recruitment

We follow these steps when recruiting new staff for roles within the school or for our online provision.

Recruitment process

- All jobs advertised include our Safeguarding Statement
- Applicants are told on their Invitation to Interview our commitment to Safeguarding

Interview process

- Applicants are asked questions during the interview to learn about their experience and attitude to working with Under 18s.
- All gaps in CV's are investigated.
- All qualifications are checked, original copy seen and copied where this is not possible screenshots are taken of the applicant with their documentation and saved.
- If the interviewee already has corrected enhanced DBS in place, dated within the last 6 months this is accepted, if they don't have one or it has an older date they are requested to apply
- Photographic proof of ID is requested and copied or where this is not possible screenshots are taken of the applicant with their documentation and saved.
- 2 references are contacted, in which their experience with Under 18 students asked about

Job Offer

- The DBS form is sent with the job offer letter and Staff or Teacher handbook which reiterates the importance of their commitment to our company ethos.

DBS Checks

All staff must have an Enhanced DBS check. If they are from abroad or have been living abroad, TopUp Learning London (Tti)/TopUp Learning (online) will check the British Council's International Criminal Records Checks directory to ensure the correct documentation is provided.

What will happen if a new staff member's Enhanced DBS is not received prior to start date:

- If they already have an Enhanced DBS for work for the children's workforce dated within the last 2 years this will be accepted in the interim period. This is providing their references can confirm their experience and the correct attitude with this age group and there are no concerns regarding gaps in their CV.
- They will not teach any classes that include students aged under 18, will not partake in Social Programme activities and will be requested not to socialise in the common areas with students.
- They can teach no more than 2 weeks without the renewed DBS
- They must have completed the online Safeguarding training and signed a Self-Declaration from before they teach their first class
- A staff member will not commence employment prior to the submission of their completed paperwork to obtain criminal clearance
- If the suitability check shows that the new staff member does have a conviction in the last 3 years related to safeguarding or posing a risk of harm to children they will not be offered a job at TopUp Learning London (Tti)/TopUp Learning (online).

2. Welfare of Under 18 students in the school

TopUp Learning London (Tti) is aware that students aged under 18 years old require additional support from our Welfare team.

We have the following important processes in place to help us safeguard them.

Stage One – Enquiry/Application

On receipt of an enquiry or an application form for a student aged under 18 the following 4 documents are sent to parent/ student or agency. These are:

- Letter of Consent to Travel
- Parental Agreement
- Safeguarding Policy – Mini Version
- Student Code of Conduct

It is made clear that the enrolment is not confirmed until the Letter of Consent to Travel and the Parental Agreement have been returned to the school with signatures.

Stage Two – Arrival in the UK

All students arriving in the UK are given our school emergency telephone number. We request that those aged 16- and 17-years old book an arrival taxi to take them to their accommodation. The taxi drivers are enhanced DBS checked. Parents are informed of the risks if not booking a taxi transfer service in the 'TopUp Learning London (Tti) Parental Agreement'. If the student is being met by a friend or family member at the airport the we require their full contact details in advance of arrival.

Stage Three – During their Stay

Section A – Accommodation

Students aged under 18 can ONLY book half board homestay accommodation through TopUp Learning London (Tti). These are arranged through our partner company Hosts International who are British Council accredited. All hosts welcoming Under 18 students are Enhanced DBS checked as per requirements. TopUp Learning London (Tti) has seen and approved of the Hosts International Safeguarding Policy.

If a student is staying in private accommodation, this needs to be included on the TopUp Learning London (Tti) Parental Agreement with the name and contact details of the person at the property.

Section B – First Day at School

As with all students, we collect their emergency contact details and check their travel documents. The form they complete includes their emergency contact, address in London and their parents contact numbers. They join our Welcome Meeting for all students.

They have a separate Welcome meeting on day two of their course with one of the DSPs. This covers: Students' comfort in accommodation, journey to school and ensuring they all have the emergency phone number in their telephones.

They must check-in with James Norman at reception on Wednesday of each week during their stay and are told about this in the Welcome Meeting.

Section C – Attendance

TopUp Learning London (Tti) has a strict Attendance Policy in place for all students. In addition to that, for this age group there are the following provisions in place:

All students aged 16 or 17 must sign in at the front desk on a daily basis before class. All students aged 16 or 17 are shown in colour on our registers to make the teacher aware of their age.

They, or their host family on their behalf, must call in before 08.45 if they are not coming to school that day.

If we have not heard from them and they are not in class, the teacher will tell the Director of Studies by 9:30am and he will call the student immediately. If the student doesn't answer and the host family are unavailable (or guardian if private accommodation) we will keep trying. We will also try to contact them through other media, including e-mail and Facebook. If we are unsuccessful in hearing any news from them by 5pm, their parents will be contacted.

Section D – Social Programme

Our Social Programme is offered for ALL students. Some activities are not suitable for this age group and they will be informed on this in the Welcome Meeting. These activities are not compulsory and those aged Under 18 can choose to attend or not

attend. Sign-up sheets are located in the Reception area. If the activity is not suitable for students Under 18 their names will be listed on the sign-up sheet so staff can be sure they do not sign up for events not suitable for their age group. All Social Activities have a risk assessment completed to ensure the whole group attending are safeguarded during the excursion. These are reviewed by the teacher prior to the excursion and the students informed of the risks and provisions put in place (see Excursion Policy).

Section E – Staff and Student Code of Conducts

We have Staff and Student Code of Conducts that we ask all to abide by at all times. These ensure that both are aware of the expectations we have of them and assist us to safeguard everyone. Everyone is asked to behave in a manner which fits within the Code of Conduct while a member of TopUp Learning London (Tti).

Section F – Health and Safety

Please see the Health and Safety Policy, the Fire Safety Policy and the Student and Staff Codes of Conduct as well as the other related policies mentioned on page one.

3. Welfare of Under 18 students online

As with face-to-face teaching, safeguarding and child protection is vital when teaching remotely. We have the following important processes in place to help us safeguard them.

- On application consent is received from the parent or guardian. Students cannot join a class without parental consent first being given.
- Online classrooms are password protected and students can only access their class through the secure platform.
- Students are strongly encouraged to keep their cameras on throughout the lesson
- We have a set of helpful classroom rules for our 'kids and teens' classes which the teacher reminds the students of at the start of each lesson
- All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:
 - Using strong password protection, with passwords that are at least 8 characters, with a combination of upper- and lower-case letters, numbers and special characters
 - Making sure the device locks automatically if left inactive for a period of time
 - Not allowing family or friends to use the device
 - Storing the device securely to avoid theft
 - Ensuring that anti-virus and anti-spyware software is up to date
 - Installing updates to ensure that the operating system remains up to date
- We have the following Zoom Safeguarding Procedures in class:
 - The waiting room is enabled
 - Teachers can instantly remove students from the classroom
 - The chat facility is managed by the teacher
 - The chat facility is disabled in the breakout rooms
 - The share screen feature is disabled for students and managed by the teacher
 - The teacher “Ends meeting for all” at the end of the class
 - Under 18s are not put in a breakout room with adults

- Participants' ability to record lessons is disabled
- Meeting auto-record is enabled
- Staff must ensure all communication with parents and students is conducted through the school following normal guidance and ensure this remains professional.
- Staff should ensure that all safeguarding concerns are reported immediately to a DSP.

4.Risk Assessments

TopUp Learning London (Tti) completes risk assessments to ensure the safeguarding of everyone at the school. Risks are identified and managed through the use of risk assessments. These will be carried out:

- on annual basis for the school environment as a whole
- for all school excursions – see Excursions Policy
- whenever there are any changes to the school environment or school practices
- following any serious incident.

These are produced by the Senior Manager and the Directors with input from school staff and students where necessary.

5.Supervision Ratio

During the classes in school there can be a maximum of 15 students aged 16 or 17 with one teacher. This matches the maximum allowed in one class at any time. On excursions, the same applies. When there are more than 15 under 18s per group, additional staff join the activity.

Online this ratio is 10 to 1. This matches the maximum allowed in one class at any time.

6. TopUp Learning Methods for Raising Awareness of Safeguarding

TopUp Learning ensures that there is a strong awareness of the importance of Safeguarding. TopUp Learning has several ways to ensure that everyone is aware of it. Below is a list of some of the ways we do this, although the list is not exhaustive:

TopUp Learning staff:

- weekly meetings providing teachers with the opportunity to raise student issues and the Director of Studies with the opportunity to update them regarding Under 18 students in school
- bimonthly meetings providing teachers with the opportunity to raise student issues and the Director of Studies with the opportunity to update them regarding Under 18 students studying online
- CPD sessions where staff participate in safeguarding training

- information on the staff noticeboards in school including photos of those aged Under 18 so they are easily recognised
- weekly Administration team meetings
- student age highlighted on registers

TopUp Learning London (Tti) students in school:

- Information provided in the Welcome Meeting
- Under 18 students attend a follow up Welcome Meeting on day 2 of their time in school
- Safety posters on the noticeboards in the classrooms
- Lessons plans developed to inform students on important aspects: e-safety, anti-bullying etc.
- Students writing relevant blog entries to help other students. The language is appropriate and text short and accessible. These are published through our online Social Media platforms at regular intervals.
- Student and Policy Handbooks accessible in student areas and online
- Long-term student meetings – from time to time students are asked to assist us with writing the policies in more accessible language for their classmates.

TopUp Learning students online:

- Information provided in at the start of lessons
- Student handbook
- Lessons plans developed to inform students on important aspects: e-safety, anti-bullying etc. Links to safeguarding videos appear on student profiles

7.Child Protection:

The Designated Safeguarding Person is the person to report any concerns raised by staff, students, or other adults regarding a student aged 16 or 17 at TopUp Learning London (Tti) or any under student aged under 18 studying online with TopUp Learning.

These are, at the time of this review, Ms Sacha Smallwood (DS) and Mrs Siân Matos (DSL).

Sacha is available at the live online reception desk at www.topuplearning.com. You can contact her by visiting our website and clicking on the red Live Reception button or by email (dos@topuplearning.com) or telephone: 00 44 7747175994. Monday to Friday. Siân is located in the main office at 148 Camden High Street. You can contact her in person Monday to Friday by visiting the main office or by email (principal.london@topuplearning.com) or telephone: 00 44 (0) 207 419 2300 or 00 44 (0)7899 677 528 from Monday to Friday.

Emergency phone number, 24/7 - 00 44 (0)7899 677 528

Types of Abuse:

There are 4 key different types of abuse: Neglect, physical, sexual and emotional abuse.

Neglect

Neglect includes:

- Young people who are left alone inappropriately.
- Young people who are abandoned.
- Young people who are inappropriately supervised.
- Young people who are left with inappropriate carers.
- Young people who are punitively or carelessly deprived of food.
- Young people whom necessary medical attention is withheld or omitted.

Things we should look for to help us recognise abuse of this kind:

- Socially repressed
- Emotionally distant/flat
- Lacking self-love, esteem or efficacy
- Poor physical growth
- Deficient social skills
- Aggressiveness or withdrawn behaviour
- Aimlessness

The child may fear the following:

- Being intimate
- Being known
- Being rejected
- Being wrong or a failure

Possible people who are causing the abuse:

- Parents
- Carers
- Anyone given the care, charge and control of a young person

Emotional Abuse

Emotional abuse includes:

- Terrorising, teasing, taunting, tormenting a young person
- Withdrawing/withholding attention, affection, emotional care
- Persistently blaming, rejecting and isolating a young person
- Derogatory remarks about a person's race, gender, physical characteristics, names and academic or sporting abilities or lack of ability
- Breaking confidentiality/using students' problems as gossip or humour
- Systematically denying a young person privacy or access to needed emotional support
- Ascribing nicknames that are offensive or derogatory and unwanted by the young person
- Shunning, rubbishing or publicising concerns of the young person
- Persistently ignoring the young person
- Research now documents the emotionally harmful impact of domestic violence.

Young people may see, hear or be held to ransom during incidents. Domestic violence is now recognised to be an emotionally abusive environment for a young person

- Grooming
- Radicalisation

Thing we should look for to help us recognise abuse of this kind:

- Failure to reach potential
- Poor self esteem
- Self-denigration
- Sense insecurity
- Withdrawn behaviour/poor socialisation
- Poor academic achievement
- Social isolation
- Needy dependent behaviour
- Experimenting behaviour

The child may fear the following:

- Being different
- Being loved/unloved
- Being known
- Being rejected
- Being emotionally exposed

Abusers can be parents, carers/teachers, other adults and other young people.

Sexual Abuse

Sexual abuse includes:

- Genital and sexual contact between a young person and an adult/ another person
- Penetration – oral, vaginal or anal
- Genital exposure
- Female genital mutilation
- Exposing young person to pornographic materials
- Any act where the young person is the object of another's sexual gratification

Things we should look for to help us recognise abuse of this kind:

- Nightmares
- Sexually precocious behaviour
- Bedwetting
- Eating problems
- Self harm or mutilation
- Substance or drug misuse
- Unexplained aggressive or withdrawn behaviour
- Suicide attempts
- Anxiety
- Depression
- Bruises

- Pregnancy
- Sexually transmitted diseases

The child may fear the following

- Pregnancy
- Physical damage
- Being blamed for the abuse
- Being disbelieved – called a liar
- Escalation of the abusive behaviour
- Being sent away – punishment
- Intimacy
- Sexually transmitted diseases

Physical Abuse

Physical abuse includes:

- Displeasure shown in physical assault
- Loss of temper or control leading to assault
- Restraint that leads to bruising or injury
- Idiosyncratic punishments that cause injury
- Bullying that leads to physical assault
- Over-chastisement/excessive discipline
- Corporal punishment causing actual bodily harm

Things we should look for to help us recognise abuse of this kind:

- Bruises*
- Fractures
- Pinch marks
- Bites
- Scalds
- Bruised eyes
- Flinching
- Withdrawn or rebellious behaviour

The child may fear the following:

- Of a certain person, a particular gender or group
- Of antagonising their abuser
- Of losing face
- Of being disbelieved or called a liar – young person unable to give a clear account of what has happened fear they will be viewed with suspicion
- Of being called a wimp
- Of others finding out
- That it won't stop or be addressed
- Of physical injury

Abusers can be parents/ relatives, teachers/carers, other adults and young people.

NB: some disabilities (or their onset) affect balance, co-ordination or the blood condition

so that the young person has frequent bruising. Even within these situations abuse might still be present.

Recognising abuse

For each of these 4 types please remember:

- Many forms of abuse may not leave physical signs
- Many kinds of sexual abused not leave physical evidence
- Forensic evidence can disappear within a short period of time
- Sexually abused young person can suffer physical injury
- Young people of all ages, able bodied, disabled, young person with or without learning differences, boys and girls from all races, cultures and classes, are abused
- Young people may indicate in different ways that they are being abused
- A young person's unhappiness and distress can often be seen in their behaviour
- Young people may also show unhappiness but can be adept at hiding their distress
- Race and culture may influence a young person's behaviour, their distress showing in different ways
- Signs and types of behaviour may indicate a young person is being abused, but may not be evidenced of abuse
- There can be other explanations for a young person's behaviour

TopUp Learning London (Tti) Staff Responsibilities

How to deal with Concerns

- TopUp Learning London (Tti) has a responsibility to investigate any student at the school who people believe could be a risk of harm. They must speak to the DS(s) if they have a concern, they have regarding one of the students. The DS will advise on what action should be taken.
- Concerns can arise from observations, information from another student, staff member etc.
- Concerns will be recorded using the Concern (and Disclosure/Allegation) Form. These are kept securely, in chronological order.
- The DS will respond to the Concern in the manner they see fit following their training. This could be monitoring, further investigation, discussing the matter with parent/ agent/ homestay host/ other DS prior to taking action.

How to Deal with Disclosures/Allegations

Disclosures/Allegations are when there is information which indicates an adult may have harmed one of TopUp Learning London (Tti)' s 16- or 17-year-old students. This could possibly be a criminal offence against or related to the child or be behaviour that

demonstrates that they could pose a risk of harm working with those aged 17 or under.

If a student speaks to a member of staff to report an incident and/or about abuse, the member of staff will follow these guidelines:

- listen to what is said without displaying shock or disbelief and accept what the child is saying. The staff member should remain calm.
- allow the child to talk freely
- not assume it is something related to abuse
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made
- reassure the child that what has happened is not their fault and that they were right to tell someone
- not ask direct questions or put words into the student's mouth, but allow the student to tell their story
- not criticise the alleged perpetrator
- not draw too much attention to the situation
- explain that they need to report this to the DS (s) who will make a record of the concern and decide on the next course of action
- inform the DS (s) IMMEDIATELY

Once the student has disclosed an allegation, the staff member must: find a member of staff to sit with them while they go immediately to report it to the DS (s). If you are teaching online use the breakout room for the student and contact the DS or DSL immediately.

- not tell the assisting staff member what it is regarding, just ask them to be there as reassuring presence
- not inform any other member of the team what the child said apart from the DS. It is confidential!
- write a report of the meeting on the Concerns (&Disclosures/Allegations) Form. This must use the student's **exact words** and make a note if their level of English is low. Do not include opinions or change the English to be grammatically correct or correct vocabulary – this is the job for the Social Services team. Use neutral language!
- it is also possible to revisit the child to make sure they are ok
- look after themselves too, it can be upsetting hearing of child abuse

Records

Only the DS(s) have access to the relevant forms. All information is recorded, and all records are signed and dated. They are kept confidentially and chronologically.

- Records show:
 - what the concerns were
 - whether any follow-up action was taken
 - how and why decisions were made
- All incidents, disclosures or signs of abuse are fully recorded with dates,

times, locations and actions taken.

Confidentiality and information sharing

The DS(s) will only share information with professionals or agencies with the student's consent. Only relevant information will be disclosed to those that need to know. Information is confidential. If the staff member reporting the concern or DSP(s) has any queries regarding confidentiality, they will seek advice from MASH.

Referrals

TopUp Learning London (Tti) is in the Borough of Camden which has everything in place to Safeguard those aged 16 or 17 years old.

For TopUp Learning London (Tti)
Camden Safeguarding Children Partnership
Telephone: 020 7974 3317
(9.00am- 5.00pm)
Out of hours: 020 7974 4444
Email: cscp@camden.gov.uk

For all accommodation providers please contact the homestay borough's Safeguarding Children's Partnership. Contact details for all partnerships for each London borough can be found at:

<https://www.londonscb.gov.uk/london-scb-contacts/>

In the case of a disclosure/ allegation:

- The DS(s) will tell the Senior Manager immediately.
- The DSL will contact Camden Safeguarding Children Partnership immediately. This is done following a discussion with the member of staff who raised the concern.
- The DS(s) will contact the parents immediately to inform them and seek their consent. Parental consent must be sought prior to the referral being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- All referrals are made by telephone and then the CAF form sent within 48 hours.
- Where the DS(s) are unsure whether to refer the student or not, they can call Camden's Child Protection Co-ordinator or the team social worker for advice. This must be on a “**no-name**” basis due to confidentiality.
- If the concern or allegation takes place outside the borough of Camden, with a homestay family, for example, the DS will contact their local authority to the incident.
- All referrals will be acknowledged by the Camden Safeguarding Children Partnership manager within 24 hours and the DS(s) informed of what action will be taken.

Attendance at case conferences and core groups

The DSL(s) will liaise, as needed with the Family Services and Social Work (FSSW) at Camden Council to ensure that all relevant information held at the school is provided to them during the investigation. They will work with them to support the child, as needed.

Allegations Against TopUp Learning London (Tti) Staff

If the event that an allegation is made against a member of staff or volunteer TopUp Learning London (Tti) will follow Camden's "Guidance for the management of an allegation against a member of staff". Policies/ Guidance | Camden Safeguarding Children Board

The Principal (who is also the Senior Manager for Safeguarding) will be TopUp Learning London (Tti) representative for the purposes of the allegation procedure. They will link with the Local Authority Designated Officer for all allegations raised. In their absence, one of the DS(s), will act in their place. The DS will also act in place of the Principal if they are the one against whom the allegations have been made.

With Camden Safeguarding Children Partnership, TopUp Learning London (Tti) will have an initial discussion at which the following actions will be agreed:

- immediate action to protect the student
- when and what the parents should be told
- what should be said to the adult facing the allegation and should s/he be suspended

Suspension – This is not an automatic response. It is considered when the child is at risk of serious harm or the concern is so serious it would result in immediate dismissal due to gross misconduct.

Suspension would be communicated to the staff member within 24 hours.

If the allegation against the staff member is substantiated, and if the Principal and MASH representative agree that the person is unsuitable to work with children. The Principal will refer the individual to the DBS to protect students aged 17 or under in the future.

TopUp Learning London (Tti) recognises the importance to provide a duty of care to the staff member against whom the allegation has been made. The Principal will be their key contact at the school during the time of the investigation.

Allegation against another student under 18

Procedure if a child protection allegation is made against another under 18 TopUp Learning student. TopUp Learning will appoint a suitable DSP to support the person who has been accused.

- The under 18s parents, (also group leader & agent if appropriate) will be informed of the allegation and kept informed at every stage of the developing situation
- DSL will follow guidance provided by local child protection authorities
- If other agencies become involved, e.g. police, the under 18 will be accompanied throughout the process by their DSP support
- If other agencies are not involved and TopUp Learning need to carry out an internal

investigation, the under 18 accused will be supported by their DSP and accompanied by them to any interviews.

Improving Safeguarding of children and vulnerable adults at TopUp Learning London (Tti)

We are always looking to improve our safeguarding and welfare procedures. If you have any queries, suggestions or worries regarding the information contained in this policy, or require further clarification of any points, please do not hesitate to contact, the DSL or any one of the DSPs.